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November 25, 2019

VIA EMAIL

The Honorable Jesse M. Furman
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Furman_NYSDChambers@nysd.uscourts.gov

Re: Usherson v. Bandshell Artist Management, 1:19-cv-6368 (JMF) Filing Under Seal

Dear Judge Furman,

Per this Court's November 20, 2019 Order directing that the papers related to Defendant's Motion for Sanctions be temporarily sealed and directing the parties to submit related documents under seal, Defendant Bandshell Artist Management submits its reply to Plaintiff's Memorandum in Opposition to Defendant's Motion for Sanctions. We are sending this letter in accordance with the Court's procedures, so that the Court can Order the temporary sealing of these specific documents: the Reply Brief, two unreported filings in other cases, the Declaration of Mark J. McKenna, and the Second Declaration of Brad R. Newberg with exhibits.

In case it is not consistent with the Court's wishes, we do want to let the Court know that very minor redactions have been made to the Exhibits attached to the Second Declaration of Brad. R. Newberg simply to remove certain specific monetary terms of settlement discussions. We have made these redactions because 1) we suspect the figures are not material to the motion; and 2) we anticipate when we file our letter brief, our position will be that with the minor redactions of monetary numbers, these documents will not need to remain under seal. If the Court would like to see these specific figures, or for us to submit them unredacted, we are, of course, happy to provide unredacted versions of these Exhibits, and we apologize in advance.

Respectfully submitted,

s/Brad R. Newberg/

Brad. R. Newberg

*Attorney for Defendant Bandshell Artist
Management.*